

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated, Plaintiffs, v. OPEN AI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI, LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION, Defendants.</p>	<p>ECF CASE No. 1:23-cv-08292-SHS</p>
<p>JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated, Plaintiffs, v. OPEN AI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI, LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION, Defendants</p>	<p>ECF CASE No. 1:23-cv-10211-SHS</p>

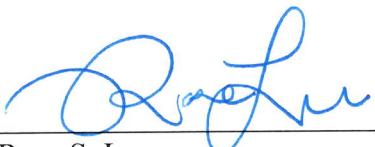
**AFFIDAVIT OF ROSE S. LEE IN SUPPORT OF MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

I, Rose S. Lee, being duly sworn deposes and says as follows:

1. I am a Partner at the law firm of Morrison & Foerster LLP.
2. I submit this declaration in support of the motion for my admission *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.
4. I have never been convicted of a felony.
5. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
6. There are no pending disciplinary proceedings in any state or federal court.
7. I respectfully request admission *pro hac vice* to appear as counsel in this matter for defendants OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC
8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 29, 2024
Palo Alto, California

By:



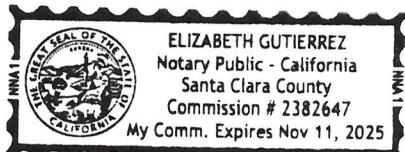
Rose S. Lee

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

Subscribed and sworn to (or affirmed) before me on
this 29th day of February, 2024, by Rose S. Lee
proved to me on the basis of satisfactory evidence to
be the person(s) who appeared before me.



(Seal)

Elizabeth G.

Notary Public